

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

REBECCA FIELD EMERSON	:	
	:	
<i>Plaintiff,</i>	:	
	:	
v.	:	CIVIL ACTION
	:	
STERN & EISENBERG, P.C.	:	No. 2:21-cv-03096
	:	
<i>Defendant.</i>	:	

**JOINT STIPULATION FOR EXTENSION OF TIME UNTIL OCTOBER 30, 2023  
FOR PARTIES TO COMPLETE DISCOVERY AND NEW SCHEDULING ORDER**

WHEREAS, the parties jointly request a thirty (30) day extension of the current discovery deadline. The parties are attending a Settlement Conference before the Honorable Pamela Carlos on September 18, 2023 to attempt to resolve the matter without incurring additional fees and costs.

WHEREAS, the current discovery end date is September 30, 2023;

WHEREAS, the parties are scheduled for the aforementioned Settlement Conference on September 18, 2023;

WHEREAS, the parties have diligently worked on discovery to date, but have not completed depositions or written discovery;

WHEREAS, Plaintiff Rebecca Field Emerson and Defendant Stern & Eisenberg, P.C., by and through their undersigned counsel, hereby jointly request that the deadline for discovery in this matter be extended thirty (30) days from its current date of September 30, 2023, to October 30, 2023. Correspondingly, the parties request a new deadline of September 30, 2023 for written discovery; a new deadline of October 30, 2023 for the completion of fact discovery; a new deadline of November 16, 2023 for dispositive motions; a new deadline of November 30, 2023 for Plaintiff

to file pretrial memoranda; a new deadline of December 15, 2023 for Defendant to file pretrial memoranda, and a date of trial or entry into trial pool of January 15, 2023.

On Behalf of Stern & Eisenberg, P.C.

**SUSANIN, WIDMAN & BRENNAN, P.C.**

/s/ Jennifer S. Abrams  
Jennifer S. Abrams  
1001 Old Cassatt Road, Suite 306  
Berwyn, PA 19312  
[jabrams@swb.law](mailto:jabrams@swb.law)

Date: September 14, 2023

On Behalf of Rebecca Field Emerson

**KOLLER LAW, LLC**

/s/ David M. Koller  
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Philadelphia, PA 19103  
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Date: September 14, 2023

**APPROVED BY:**

Dated: \_\_\_\_\_

\_\_\_\_\_  
**J.**